

\*\*E-filed 10/5/06\*\*

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6  
7

8 IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
9 SAN JOSE DIVISION

10 UNITED STATES OF AMERICA, ) No. CR 06-00111-JF  
11 )  
Plaintiff, )  
12 )  
v. ) **STIPULATION AND [PROPOSED]**  
13 ) **ORDER TO CONTINUE STATUS DATE**  
JOHN WHITE, )  
14 )  
Defendant. )  
15 \_\_\_\_\_ )

16 Assistant United States Attorney Carlos Singh and defendant, John White, through his  
17 counsel, Assistant Federal Public Defender Angela M. Hansen, stipulate and agree that the status  
18 date in the above-captioned matter, presently scheduled for October 4, 2006, at 9:00 a.m., should  
19 be continued to November 1, 2006 at 9:00 a.m.

20 The parties stipulate and agree that the status date should be continued because counsel  
21 for Mr. White needs additional time to investigate this case and to collect old records that may be  
22 relevant to Mr. White's defense and sentencing exposure. Additionally, the parties are currently  
23 conducting plea negotiations, and the government needs additional time to consider the  
24 defendant's request for a misdemeanor disposition. For these reasons, the parties stipulate and  
25 agree to continue the status to November 1, 2006, at which time the parties expect to have a  
26 disposition of the matter.

The parties further stipulate and agree that under 18 U.S.C. §§ 3161(h)(8)(A) and (B)(iv),

1 the ends of justice served by the continuance requested outweigh the best interest of the  
2 defendant and public in a speedy trial because the failure to grant such a continuance would  
3 unreasonably deny Mr. White the time necessary for effective preparation, taking into account  
4 the exercise of due diligence.

5  
6 SO STIPULATED.

7  
8 Dated: October 3, 2006

\_\_\_\_\_  
/s/  
ANGELA M. HANSEN  
Assistant Federal Public Defender

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10  
11 Dated: October 3, 2006

\_\_\_\_\_  
/s/  
CARLOS SINGH  
Assistant United States Attorney


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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	No. CR 06-00111-JF
	)	
Plaintiff,	)	<b>[PROPOSED] ORDER CONTINUING</b>
	)	<b>STATUS DATE AND EXCLUDING</b>
v.	)	<b>TIME</b>
	)	
JOHN WHITE,	)	
	)	
Defendant.	)	
_____	)	

The parties have jointly requested to continue the status date and good cause appearing, IT IS HEREBY ORDERED that the status date presently set for October 4, 2006 at 9:00 a.m. is continued to November 1, 2006 at 9:00 a.m. Pursuant to the parties' stipulation, IT IS FURTHER ORDERED that the period of time from October 4, 2006 through and including November 1, 2006, shall be excluded from the period of time within which trial must commence under the Speedy Trial Act, 18 U.S.C §§ 3161(h)(8)(A) and (B)(iv).

Dated: October 4, 2006

  
JEREMY FOGEL  
United States District Judge

1 Distribute to:

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